

## REMARKS

Claims 1-4, 7-20, 71, 74-81, and 83-84 were pending and stand rejected. Claims 83-84 have been cancelled. Claims 1, 7-8, 20, 71, and 75 have been amended. Claims 85-93 have been added. Claims 1-4, 7-20, 71, 74-81, and 85-93 are pending upon entry of this amendment.

Claims 1-2, 4, 7, 9-11, 13, 15-16, 19-20, 71, 74-75, and 77-78 stand rejected under 35 U.S.C. § 102(c) as being anticipated by Anderson. Applicants respectfully traverse.

### CLAIM 1

On December 4, 2006, the Examiner and the undersigned attorney discussed Anderson and claim 1 (as previously pending) over the telephone. No agreement was reached. The substance of the discussion is set forth herein.

As amended, claim 1 recites:

In a computer-implemented animation system, a method for animating an object, the method comprising:

- receiving a first input, the first input specifying a first parameter behavior, the first parameter behavior indicating how to change a value of a first parameter over time, wherein the first parameter applies to one element of a group consisting of a motion behavior applied to the object, a filter applied to the object, and a generator applied to the object;
- animating the object by changing the value of the first parameter over time according to the specified parameter behavior; and
- outputting the animated object.

As recited in claim 1, a “parameter behavior” indicates how to change, over time, a value of a parameter of a “motion behavior.” As explained in the application, in one embodiment, a motion behavior changes an object’s position over time, thereby animating the object (¶247). A motion behavior can be customized using a parameter (¶9). The value of the parameter affects the motion behavior, which in turn affects the animation of an object. For example, a motion behavior with a parameter value of 1 will result in a different animation than the same motion behavior with a parameter value of 10.

The value of a motion behavior's parameter can be programmatically animated (i.e., changed over time) by using a parameter behavior (§402). This results in different animations as time goes on, based on the different values of the parameter. For example, consider the Drag parameter of the Orbit Around motion behavior (§404). If the value of the Drag parameter is kept constant over time, the object moves in a regular orbit with a circular motion path (§404; FIG. 34). If, instead, the value of the Drag parameter is increased over time (e.g., using the Ramp parameter behavior), the object's orbit slowly decays over time, causing the object to fall towards the center of the orbit with a spiral motion path (§404; FIG. 35).

Anderson does not disclose, teach, or suggest the claimed "parameter behavior indicating how to change a value of a first parameter [applied to a motion behavior] over time." The first step in the analysis is to identify the underlying motion behavior. Consider the vector field example in Anderson (§39; FIG. 4). Assume that the up and down motion of an object corresponds to the claimed "motion behavior." The next step is to identify a parameter of the motion behavior that can be set (i.e., changed). Anderson does not mention any such parameters. However, assume *arguendo* that some parameters were disclosed, such as frequency and maximum amplitude. Anderson does not mention programmatically changing the values of these parameters over time. For example, if the frequency were to increase over time, the object would move up and down faster and faster. If the maximum amplitude were to increase over time, the object would move farther up and farther down. Neither of these motions is disclosed in Anderson.

Next, consider the low gravity example in Anderson (§38). Assume that the "falling down" of an object due to a gravity vector corresponds to the claimed "motion behavior." Anderson mentions that the gravity vector can be reduced. In other words, the magnitude of the gravity vector can be changed and thus corresponds to a parameter of the motion behavior that

can be set. However, Anderson does not mention programmatically changing the values of this parameter over time. For example, if the magnitude of the gravity vector were to decrease over time, a bouncing object would move farther up on each bounce. This motion is not disclosed in Anderson.

Also, Anderson mentions neither filters nor generators. Thus, Anderson does not anticipate claim 1.

#### **CLAIM 71**

As amended, claim 71 recites:

A method for animating an object using a behavior, comprising:  
    outputting an original animation for the object according to a first parameter behavior, the first parameter behavior indicating how to change a value of a first parameter over time, wherein the first parameter applies to a motion behavior applied to the object;  
    concurrently with outputting the original animation, accepting user input that specifies a second parameter behavior, the second parameter behavior indicating how to change a value of a second parameter over time, wherein the second parameter applies to the same motion behavior applied to the object; and  
    outputting an updated animation for the object according to the second parameter behavior.

As explained above with respect to claim 1, Anderson does not disclose, teach, or suggest the claimed “parameter behavior indicating how to change a value of a first parameter [applied to a motion behavior] over time.” Thus, Anderson does not anticipate claim 71.

#### **CLAIM 83**

Claims 12, 14, 17-18, and 83 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Miyagawa. Applicants respectfully traverse. Claim 83 has been cancelled.

#### **CLAIM 84**

Claim 84 stands rejected under 35 U.S.C. § 102(e) as being anticipated by Land. Applicants respectfully traverse. Claim 84 has been cancelled.

#### **CLAIMS 86-90**

Although new claims 86-90 have not been rejected, Applicants note the following:

Anderson does not disclose, teach, or suggest a “first behavior indicating how to change a value of a first parameter of the object over time ... wherein the first behavior comprises one from a group consisting of”

claim 86: “a Snap Alignment to Motion behavior...”

claim 87: “an Attracted To behavior...”

claim 88: “a Drag behavior...”

claim 89: “an Orbit Around behavior...”

claim 90: “a Spring behavior.”

None of the vector response characteristics discussed by Anderson result in a Snap Alignment to Motion behavior, an Attracted To behavior, a Drag behavior, etc.

Similarly, none of the animations discussed by Miyagawa result in a Snap Alignment to Motion behavior, an Attracted To behavior, a Drag behavior, etc.

Thus, claims 86-90 are patentable over both Anderson and Miyagawa, alone and in combination.

#### **CLAIMS 91-93**

Although new claims 91-93 have not been rejected, Applicants note the following:

Land does not disclose, teach, or suggest a “first behavior indicating how to change a value of a first parameter of the text object over time ... wherein the first behavior comprises one from a group consisting of”

claim 91: “a Scroll Up behavior...”

claim 92: “a Randomize behavior, which incrementally displays the text object character-by-character, wherein character order is random...”

claim 93: “a Sequence behavior...”

None of the animations discussed by Land result in a Scroll Up behavior, a Randomize behavior, a Sequence behavior, etc.

Thus, claims 91-93 are patentable over Land.

## **OTHER CLAIMS**

Claim 3 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Watanabe. Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Walton. Claims 76 and 79 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of French. Claims 80-81 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Anderson in view of Sowizral.

Applicants respectfully traverse. The claims not specifically mentioned above depend from their respective base claims, which were shown to be patentable over Anderson. In addition, these claims recite other features not included in their respective base claims. Thus, these claims are patentable for at least the reasons discussed above, as well as for the elements that they individually recite.

Applicants respectfully submit that the pending claims are allowable over the cited art of record and request that the Examiner allow this case. The Examiner is invited to contact the undersigned in order to advance the prosecution of this application.

Respectfully submitted,  
GREGORY E. NILES, ET AL.

Dated: January 4, 2007

---

By: /Sabra-Anne R. Truesdale/  
Sabra-Anne R. Truesdale, Reg. No.: 55,687  
Fenwick & West LLP  
Silicon Valley Center  
801 California Street  
Mountain View, CA 94041  
Tel.: (650) 335-7187  
Fax.: (650) 938-5200